Honored Commissioners:

I am writing in comment on your proposal to require tracking of VOIP phones which make use of Wi-Fi. In the interest of time, I will not rehash the published proceedings, and will simply state and suggest the following:

1) Tracking Wi-Fi access points is not possible. Given that the item is $100 or less, ANYONE can purchase one and install it. Are they then going to be required to register it with the FCC? What if they decide to move it? Will they have to update or re-register? How far can they move it w/o having to update or re-register? What kind of infrastructure will the FCC require to track all the information? How much information will be required to register? Will it be subject to FOIA disclosures?

2) Laptops can be setup to work as an access point. How do you even register a laptop's location? What if you're driving along, stop by a beach and activate the laptop? What do you even enter as a location?

Wi-Fi devices lock on to the closest access point - if that happens to be my laptop and the caller is in the middle of a 911 call and I happen to shut my laptop off, am I now liable? What if there are no other access points that the VOIP phone can connect to (but my laptop could because I had a better antenna in my laptop)?

3) I could go on and on with more potential scenarios - but I don't believe it's necessary. The problem of tracking, registering, and triangulating WI-Fi access points is intractable. The costs are astronomical, and it won't work, so don't even try.

4)I suggest the following. Require a VOIP phone to have a GPS receiver. If and only if someone dials 911, the phone will receive its GPS coordinates and transmit them to the VOIP provider in a special packet. That special packet will be sent to a 911 server maintained by the VOIP provider which will map the GPS coordinates to the relevant 911 center and pass the call along to that center. This is substantially less expensive, and will work because the locations of all 911 centers and the areas they serve is well-known - conversely, the locations of Wi-Fi Access points and the areas they serve is NOT well known.

5) At least initially the call would just get sent to a dispatcher in the correct 911 facility. In the future, enhanced services could include the actual GPS coordinates captured by the phone so that the dispatcher could match the location on a map of the local area.

6) Tell the advertisers and marketers NO - they can not have this information - it's for 911 ONLY and will only be sent when a 911 call is made. You'll put to rest all of the privacy fears BEFORE they even get started, and you'll allow a fledging communications method to continue to grow and prosper.

Thank you for the opportunity to comment on this proceeding. Please do feel free to contact me if you have any questions, comments, or require additional information.

Sincerely,

David S. Greenberg